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If I am correct, the intent behind CTRs is to identify and report potential criminal activity typically associated with cash transactions. The existing process centers on the cash activity in a given day, but in my opinion, the process could be dramatically improved if financial institutions were required to report cash activity over a period of time – a week or a month for example. I believe extending the “collection period” along with a commensurate increase in the threshold would have some overall positive effects. I believe it would be considerably more difficult for an individual to structure since the collection period would be longer. Also, the actual number of CTRs filed by financial institutions – and supposedly reviewed by the IRS – should be fewer; a dual benefit – (1) improved analytical data available to the IRS and (2) a reduction in the amount of work required of financial institutions. Furthermore, with the potential reduction of structuring opportunities, there would also be a dramatic improvement in SAR quality through the elimination of defensive filing.

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